

CALIFORNIA DEPARTMENT OF INSURANCE  
LEGAL DIVISION  
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Attorneys for The California Department of Insurance

**BEFORE THE INSURANCE COMMISSIONER  
OF THE STATE OF CALIFORNIA**

In the Matter of the Licenses and Licensing  
Rights of

LORRAINE IGLESIAS,

Respondent.

File No. SAC 10298-AP

ACCUSATION

The Insurance Commissioner of the State of California in his official  
capacity alleges that:

**I**

Respondent LORRAINE IGLESIAS, now is, and since May 13, 1998, has been  
the holder of a license issued by the Insurance Commissioner of the State of California to act as a  
fire and casualty broker-agent.

**II**

On July 22, 1988, in Case No. 114714-0, in the Municipal Court for the Fremont-  
Newark-Union City Judicial District, County of Alameda, State of California, Respondent was

1 convicted upon a plea of guilty, of use and being under the influence of a controlled substance,  
2 methamphetamine, a violation of Section 11550 of the California Health and Safety Code, a  
3 misdemeanor.

### 4 III

5 On June 7, 1989, in Case No. 122174-3, in the Municipal Court for the Fremont-  
6 Newark-Union City Judicial District, County of Alameda, State of California, Respondent was  
7 convicted upon a plea of no contest, of use and being under the influence of a controlled  
8 substance, methamphetamine, a violation of Section 11550 of the California Health and Safety  
9 Code, a misdemeanor.  
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### 11 IV

12 On October 4, 1989, in Case No. 127047-1, in the Municipal Court for the  
13 Fremont-Newark-Union City Judicial District, County of Alameda, State of California,  
14 Respondent was convicted upon a plea of guilty, of two counts of forgery, in violation of  
15 California Penal Code Section 470, misdemeanors.  
16

### 17 V

18 On October 6, 1995, in Case No. 164969-1, in the Municipal Court for the  
19 Fremont-Newark-Union City Judicial District, County of Alameda, State of California,  
20 Respondent was convicted upon a plea of no contest, of possession of an instrument and weapon  
21 of the kind commonly known as a dirk/dagger, a violation of Section 12020(a) of the California  
22 Penal Code, a misdemeanor.  
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### 24 VI

25 On April 20, 1998, in Case No. SC62356, in the Superior Court of San Joaquin  
26 County, State of California, Respondent was convicted upon a plea of no contest, of a violation of  
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1 Section 11377(a) of the California Health and Safety Code, possession of a controlled substance,  
2 methamphetamine, a misdemeanor.

3 VII

4 On April 20, 1998, in Case No. SC62356, in the Superior Court of San Joaquin  
5 County, State of California, Respondent was convicted upon a plea of no contest, of a violation of  
6 Section 484(a) of the California Penal Code, petty theft, a misdemeanor.  
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8 VIII

9 On March 9, 1998, Respondent filed an application for the license referred to  
10 above in Paragraph I. Question No. 19 on Respondent's application reads:

11 (a) "Have you ever been convicted of a crime?  
12 'Crime' includes a felony or misdemeanor and military offenses.  
13 Convicted includes, but is not limited to, having been found guilty by  
14 verdict of a judge or jury, having entered a plea of guilty or nolo  
15 contendere, having had any charge dismissed or plea withdrawn  
16 pursuant to Penal Code Section 1203.4, or having been given  
probation, a suspended sentence or a fine. You may exclude traffic  
citations and juvenile offenses."

17 Respondent answered "No" to said question. Such answer was false and known to Respondent to  
18 be false in that Respondent had been convicted of the offenses alleged above in Paragraphs II  
19 through V.

20 IX

21 On April 9, 1998, Respondent filed an amended application for the license  
22 referred to above, in Paragraph I. Said application was signed by Respondent on March 24, 1998.  
23 Question No. 19 on Respondent's application reads:

24 "Have you ever been convicted of a crime? 'Crime' includes a  
25 felony or misdemeanor and military offenses. 'Convicted'  
26 includes, but is not limited to, having been found guilty by verdict  
27 of a judge or jury, having entered a plea of guilty or nolo  
28 contendere, having had any charge dismissed or plea withdrawn

1 pursuant to Penal Code section 1203.4, or having been given  
2 probation, a suspended sentence or a fine. You may exclude traffic  
3 citations and juvenile offenses.

4 Respondent answered "No" to said question. Such answer was false and known to  
5 Respondent to be false in that Respondent had been convicted of the offenses alleged  
6 above in Paragraphs II through V.

7 X

8 On June 5, 2000, Respondent filed a renewal application for the license referred  
9 to above, in Paragraph I. Said application was signed by Respondent on May 30, 2000. Question  
10 No. 4 on Respondent's application reads:

11  
12 "Have you since your last previous application to the California Department of  
13 Insurance been convicted of a crime?  
14 'Crime' includes, but is not limited to a felony, a misdemeanor or a military  
15 offense. 'Convicted' includes, but is not limited to, having been found guilty by a  
16 verdict of a judge or jury, having entered a plea of guilty or nolo contendere,  
17 having had any charge expunged, dismissed or plea withdrawn pursuant to Penal  
18 Code Section 1203.4, or having been given probation, a suspended sentence or a  
19 fine. You may exclude traffic citations and juvenile offenses tried in juvenile  
20 court."

21 Respondent answered "No" to said question. Such answer was false and known to Respondent  
22 to be false in that Respondent had been convicted of the offenses alleged above in Paragraphs VI  
23 and VII.

24 XI

25 The facts alleged above in Paragraphs II through X show that it would be against  
26 the public interest to permit Respondent to continue transacting insurance in the State of  
27 California and constitute grounds for the Insurance Commissioner to suspend or revoke the  
28 licenses and licensing rights of Respondent pursuant to the provisions of Sections 1668(b) and  
1738 of the California Insurance Code.

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2 XII

3 The facts alleged above in Paragraphs II through X show that Respondent is  
4 lacking in integrity and constitute grounds for the Insurance Commissioner to suspend or revoke  
5 the licenses and licensing rights of Respondent pursuant to the provisions of Sections 1668(e) and  
6 1738 of the California Insurance Code.

7 XIII

8 The facts alleged above in Paragraphs IV and VII show that Respondent has  
9 previously engaged in a fraudulent practice or act and constitute grounds for the Insurance  
10 Commissioner to suspend or revoke the licenses and licensing rights of Respondent pursuant to  
11 the provisions of Sections 1668(i) and 1738 of the California Insurance Code.  
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13 XIV

14  
15 The facts alleged above in Paragraphs IV and VII show that Respondent has been  
16 convicted of a public offense having as one of its necessary elements a fraudulent act or an act of  
17 dishonesty in acceptance, custody or payment of money or property and constitute grounds for the  
18 Insurance Commissioner to suspend or revoke the licenses and licensing rights of Respondent  
19 pursuant to the provisions of Sections 1668(m)(3) and 1738 of the California Insurance Code.  
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21 XV

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23 The facts alleged above in Paragraphs II through V and VIII, show that  
24 Respondent has knowingly or willfully made a misstatement in an application filed with the  
25 Insurance Commissioner on March 9, 1998, and constitute grounds for the Insurance  
26 Commissioner to suspend or revoke the licenses and licensing rights of Respondent pursuant to  
27 the provisions of Sections 1668(h) and 1738 of the California Insurance Code.  
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XVI

The facts alleged above in Paragraphs II through V and IX, show that Respondent has knowingly or willfully made a misstatement in an amended application, filed with the Insurance Commissioner on April 9, 1998, and constitute grounds for the Insurance Commissioner to suspend or revoke the licenses and licensing rights of Respondent pursuant to the provisions of Sections 1668(h) and 1738 of the California Insurance Code.

XVII

The facts alleged above in Paragraphs VI, VII and X, show that Respondent has knowingly or willfully made a misstatement in a renewal application, filed with the Insurance Commissioner on June 5, 2000, and constitute grounds for the Insurance Commissioner to suspend or revoke the licenses and licensing rights of Respondent pursuant to the provisions of Sections 1668(h) and 1738 of the California Insurance Code.

Dated: \_\_\_\_\_.

CALIFORNIA DEPARTMENT OF INSURANCE

By \_\_\_\_\_  
Jerry L. Whitfield  
Assistant Chief Counsel